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**NAVY ENVIRONMENTAL HEALTH CENTER
ENVIRONMENTAL PROGRAMS DIRECTORATE**

Health and Safety Plan Review

Location: Williamsburg, Virginia

Command: Cheatham Annex

Site: Site 1, Depression Area

Work Description: Soil and Sediment Excavation

Document Date: August 21, 2006

Contract No/Contract Task Order No: N62470-03-D-3260/069

EP Document No: 1701

Prepared for: NAVFAC Atlantic

Prepared by: Shaw Environmental

Date Received: 9 September 2006

Reviewed by:

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Enclosure (1)

HEALTH AND SAFETY PLAN REVIEW

- Ref: (a) 29 CFR 1910.120 (Hazardous Waste Operations and Emergency Response)
(b) 29 CFR 1926.65 (Hazardous Waste Operations and Emergency Response)
(c) Navy/Marine Corps Installation Restoration Manual (February 1997)
(d) U. S. Army Corps of Engineers, Safety and Health Requirements Manual, EM 385-1-1

General Comments:

1. We compared this health and safety plan (HASP) to federal requirements found in references (a) through (d), and have noted discrepancies in this HASP from these primary references.

2. The text states, on page 4-1, that based on previous work in the area, levels of contaminants present are not anticipated to reach levels that will pose a significant health risk to site workers, provided dust and skin contact are controlled. The text states on page 9-8 that site personnel may be required to contain and clean up any spill at the site. However, the text does not mention if any specific emergency responder training required by paragraph (q) of 29 CFR 1910.120 for emergency responders has been conducted (or is required).

3. The text references Shaw Health and Safety Procedures Numbers HS400 and HS401; however, these procedures were not incorporated into this draft HASP and we were unable to review them. The site specific health and safety procedures were to be contained in Appendix B of the text; however, Appendix B contains no procedures. The referenced procedures, along with the final HASP, should be made available to workers on site.

Specific Comments:

1. Page 9-2, Table 9.2, "Emergency Telephone Numbers"

Comment: Telephone numbers are not provided for the Local Emergency Planning Committee.

Recommendation: Provide appropriate emergency telephone numbers and verify them prior to starting site work.

2. Page 9-9, Section 9.4.3, "Emergency Response Equipment"

Comment: The text states, that eyewashes will be provided for use during an emergency. It is unclear if the eyewash meets the criteria of the American National Standards Institute (ANSI) standard Z-358.1-2004 or later, and is capable of providing flushing fluid to the eyes at 1.5 liters per minute (0.4 gallon per minute) for a minimum of 15 minutes.

Recommendation: Ensure that the eyewash station is ANSI certified.

3. Page 9-9, Section 9.4.5, "Medical Emergency Contingency Measures"

Comment: The text states "A minimum of two first aid/CPR personnel will be maintained on site." The text does not clearly state that the employees certified in first aid techniques and CPR will be trained in the Bloodborne Pathogens Standard, 29 CFR 1910.1030, and be offered the Hepatitis B vaccination.

Recommendation: Revise the final site-specific HASP to include information stating that employees certified in First Aid techniques and CPR will be trained in the Bloodborne Pathogens Standard, 29 CFR 1910.1030, and be offered the Hepatitis B vaccination.